

EXHIBIT A

1 UNITED STATES DISTRICT COURT
 2 FOR THE NORTHERN DISTRICT OF CALIFORNIA

3 IN RE: SOCIAL MEDIA ADOLESCENT :MDL NO.
 4 ADDICTION/PERSONAL INJURY PRODUCTS :4:22-MD-
 5 LIABILITY LITIGATION :3047-YGR
 6 :

7 SUPERIOR COURT OF THE STATE OF CALIFORNIA
 8 FOR THE COUNTY OF LOS ANGELES
 9 SPRING STREET COURTHOUSE
 10 - - -

11 COORDINATION PROCEEDING SPECIAL TITLE :
 12 (RULE 3,400) :
 13 :
 14 SOCIAL MEDIA CASES :
 15 :LEAD CASE
 16 :NO. FOR
 17 THIS DOCUMENT RELATES TO: :FILING
 18 :PURPOSES
 19 STATE OF TENNESSEE, ex rel, JONATHAN :22STCV21355
 20 SKRMETTI, ATTORNEY GENERAL and :
 21 REPORTER, :
 22 :
 23 V. :
 24 :
 25 META PLATFORMS, INC., and INSTAGRAM, :
 :
 :
 CASE NO. 23-1364-IV :

16 - - -
 17 DEPOSITION UNDER VIDEO EXAMINATION OF
 18 VAISHNAVI JAYAKUMAR
 19 JANUARY 31, 2025
 20 VOLUME II

21 Continued videotaped deposition of
 22 VAISHNAVI JAYAKUMAR, taken pursuant to notice, was
 23 held at the law offices of Baker Botts, LLP, 30
 24 Rockefeller Plaza, New York, New York, beginning at
 25 a.m., on the above date, before Michelle L. 8:34
 Ridgway, a Registered Professional Reporter,
 Certified Court Reporter (NJ-CCR # XI02126),
 Certified Realtime Reporter, Certified Shorthand
 Reporter (CA-CSR # 14592), and Notary Public.

1 with their side.

2 Q. Okay. And did you have a
3 conversation with anyone who wasn't a lawyer about
4 the possibility of being deposed in this case?

5 A. About the possibility of being
6 deposed, no.

7 Q. Did you talk with any about --
8 anyone about the deposition that was not one of the
9 lawyers?

10 A. Yes. I asked other people who had
11 been deposed what their experiences were like.

12 Q. Who did you ask?

13 A. I asked Arturo Bejar what his
14 experience was like.

15 I think that was about it.

16 Q. Anyone else?

17 A. No, I don't think so.

18 Q. When did you talk to Arturo?

19 A. We -- we've been in touch. We've
20 known each other for quite some time, so we have
21 talked regularly. Maybe like a week ago.

22 Q. So about a week ago is when you
23 talked with him about the deposition?

24 A. No. I mean, not about the
25 specifics of the deposition. I was just asking

1 him, like, you know, do you have any advice, do you
2 think I should, like, be calm. Like, I was really
3 nervous coming into the deposition. So I was
4 asking him for, like, advice on how to go into the
5 deposition.

6 Q. What did he say?

7 A. He said be honest, be truthful, be
8 as helpful as you can.

9 Q. Did you talk with him about
10 anything else?

11 A. No.

12 Q. Now, let's just take a step back.
13 Before one week ago when you had
14 that conversation, you said you were in touch with
15 Arturo Bejar before, right?

16 A. Yes. We run in the same circles.
17 Have been for a while.

18 Q. When did you meet?

19 A. Maybe like a year and a half, two
20 years ago.

21 Q. And how often have you been in
22 touch?

23 A. Perhaps two or three times. We
24 were on -- I think we were on a couple of projects
25 together at Meta. We would have been on the same

1 e-mail thread, I think. But we didn't know each
2 other personally until after Meta.

3 Q. And have you discussed this
4 litigation with him before one week ago at all?

5 A. Yes. I've asked him if he had been
6 deposed, what his experience was like.

7 Q. What did he say?

8 A. He said everyone was very
9 respectful. He said that, you know, I should think
10 about whether I want -- what I want my legal
11 representation to be. That was about it.

12 Q. Did he give you advice about who to
13 engage?

14 A. He suggested that I reach out to
15 Mike.

16 Q. Did you talk about anything else
17 related to the litigation?

18 A. No.

19 Q. Did you talk about anything else
20 related to the underlying claims in the litigation?

21 A. No.

22 Q. And you had mentioned you worked
23 with him or you had had contact with him during the
24 time at Meta?

25 A. No, no --

1 speculation.

2 THE WITNESS: Yes.

3 BY MR. SNEED:

4 Q. Okay. Now, we talked a little bit
5 about Arturo Bejar. I also wanted to ask you about
6 whether or not you know France Haugen?

7 A. Yes. We met -- we met at a
8 conference about a year ago.

9 Q. So that was after you had left
10 Meta?

11 A. Yes.

12 Q. So you never met her or worked with
13 her while you were at Meta?

14 A. No.

15 Q. She wasn't in the youth safety
16 group that you worked in at Meta?

17 A. No.

18 Q. And are you aware of any time, to
19 your knowledge, that Ms. Haugen worked on child
20 safety issues at Meta?

21 A. Not to my knowledge, no.

22 Q. Now, since you left Meta, you said,
23 about a year ago, you met Ms. Haugen?

24 A. Yes.

25 Q. How did you -- how did you meet?

1 You mentioned at a conference?

2 A. Yes.

3 Q. And what did you talk about?

4 A. She was giving a talk at a
5 conference, and so I think I met her on the
6 sidelines, and I appreciated her talk.

7 Q. What was she talking about?

8 A. I don't recall.

9 Q. And since then, you all have met on
10 other occasions?

11 A. I think we have probably spoken
12 once after that.

13 Q. And what did you speak about?

14 A. Frances runs a nonprofit, and I was
15 trying to understand more about the nonprofit world
16 building.

17 Q. And what did she say?

18 A. She talked about how challenging it
19 was to find, you know, supporters of child safety
20 in the nonprofit space. I shared some of the work
21 that we do at Vyanams Strategies. You know, we're
22 a company; we're not a nonprofit. Yeah.

23 Q. Well, you and Ms. Haugen serve on
24 Sustainable Media Center's advisory board; is that
25 right?

1 A. Yes.

2 Q. And does that require you all to
3 meet at various occasions?

4 A. She just joined the Sustainable
5 Media board, so I have not met her in that
6 capacity.

7 Q. Have you had any e-mail
8 correspondence with her?

9 A. Not in -- in relation to the
10 Sustainable Media Center?

11 Q. No, in general. Have you had any
12 e-mail correspondence with Ms. Haugen?

13 A. Yes.

14 Q. Have you had phone calls with
15 Ms. Haugen?

16 A. Yes.

17 Q. Have you had text messages with
18 Ms. Haugen?

19 A. No.

20 Q. And besides the time that we talked
21 about at the conference, have you met in person?

22 A. No.

23 Q. And let me go back to Mr. Bejar.
24 Besides the times that you told us
25 that you had meetings, have you had e-mail contact

1 with Mr. Bejar?

2 A. Yes.

3 Q. Have you had text messages with
4 Mr. Bejar?

5 A. Yes.

6 Q. And, in fact, over the last year
7 and a half, you've had regular discussions with
8 him; is that fair?

9 A. I wouldn't characterize them as
10 regular. I would say we -- yeah. I wouldn't
11 characterize them as regular. They are quite
12 scarce.

13 Q. Okay. Let's talk a little bit
14 about the role that you had at Meta.

15 And if you have handy Exhibits 40
16 and 41 that were marked previously. You have
17 those -- those e-mails in front of you?

18 A. Yes.

19 Q. And you remember talking about
20 those e-mails previously?

21 A. Yes.

22 Q. Now, in those e-mails, the very
23 first e-mails, e-mails -- both of them are e-mails
24 from you to youth advisors, correct?

25 A. Yes, that's right.

CERTIFICATE

I HEREBY CERTIFY that the witness was duly sworn by me and that the deposition is a true record of the testimony given by the witness.

It was requested before completion of the deposition that the witness, VAISHNAVI JAYAKUMAR, have the opportunity to read and sign the deposition transcript.



MICHELLE L. RIDGWAY,
Certified Shorthand Reporter,
(CA-CSR # 14592)
(Certified Court Reporter
(NJ-CCR # XI02126)
Registered Professional Reporter,
Certified Realtime Reporter
and Notary Public
Dated: February 4, 2025

(The foregoing certification of this transcript does not apply to any reproduction of the same by any means, unless under the direct control and/or supervision of the certifying reporter.)